IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

WSOU INVESTMENTS, LLC d/b/a, BRAZOS LICENSING AND DEVELOPMENT

Plaintiff,

 \mathbf{v} .

GOOGLE LLC,

Defendant.

Civil Case No. 6:20-cv-580-ADA

JURY TRIAL DEMANDED

DECLARATION OF DMITRY LIZORKIN

- I, Dmitry Lizorkin, a fact witness in the above-captioned action have been informed of and understand that:
 - WSOU Investments, LLC d/b/a Brazos License and Development ("WSOU") and Google LLC ("Google") may take my deposition pursuant to Federal Rules of Civil Procedure.
 - 2. During the deposition, I may be assisted by my own counsel.
 - 3. I currently live and work in Switzerland, and will voluntarily appear at the Swiss offices of Quinn Emanuel at Dufourstrasse 29, 8008 Zurich, Switzerland or, if required, at another location in the canton of Zurich, Switzerland, for the purpose of this deposition.
 - 4. I am not obligated to appear and participate in the deposition and cannot be subjected to any coercive measures.
 - 5. By being deposed in the canton of Zurich, Switzerland, I have been apprised that I have rights under Swiss law.

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6. At any time during examination, I may invoke any right or duty to refuse testimony under

Swiss Law. I understand that my rights to refuse testimony are set out in particular in

Articles 165-166 of the Swiss Code of Civil Procedure.

7. At any time during examination, I may also invoke any right or duty to refuse testimony

under U.S. Law. In particular, I understand that I am entitled to refuse to answer any

question pertaining to/or which may invoke attorney-client privilege and/or attorney

work-product.

8. The Swiss Commissioner in this matter, Olivier Buff, with address at Quinn Emanuel

Urguhart Sullivan (Schweiz) GmbH, Dufourstrasse 29, 8008 Zurich, Switzerland, will

serve as my agent of service ("Domizilhalter") in Switzerland in this matter. Thus, any

correspondence from the US or Swiss authorities may validly be delivered to Olivier

Buff, and he will then forward to me.

In view of the above, I hereby consent to having my deposition taken in the above-captioned

matter by oral examination in the English language under oath, recorded by video and stenography,

at a date to be determined.

I confirm that I am cooperating of my own accord.

DATED: 02.02, 2023

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